

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

LELCHOOK, *et al.*,

Plaintiffs,

-against-

SOCIÉTÉ GÉNÉRALE DE BANQUE AU LIBAN  
SAL,

Defendant.

19-cv-00033-RJD-SJB

**DECLARATION OF MICHAEL J. SULLIVAN**

1. I am a Partner with Ashcroft Law Firm, LLC, attorneys for Defendant Société Générale De Banque au Liban S.A.L. (“SGBL”) in the above-captioned action. I submit this declaration to place before the court certain documents referenced in SGBL’s Memorandum of Law in Support of its Motion to Dismiss Plaintiff’s First Amended Complaint.

2. Attached hereto as **Exhibit A** is a true and correct copy of the March 7, 2013, Sworn Claim (Dkt. 442) filed by SGBL in *U.S. v. Lebanese Canadian Bank SAL*, Case 1:11-cv-09186-PAE (U.S. Dist. Ct., S.D.N.Y.).

3. Attached hereto as **Exhibit B** is a true and correct copy of the June 25, 2013, Stipulation and Order (Dkt. 462) entered into by and between the United States, Lebanese Canadian Bank SAL, and SGBL in that proceeding.

4. Attached hereto as **Exhibit C** is a true and correct copy of the January 2, 2019, Related Case Statement (Dkt. 11) filed in *Lelchook v. Lebanese Canadian Bank SAL*, Case 1:18-cv-12401 (U.S. Dist. Ct., S.D.N.Y.).

5. Attached hereto as **Exhibit D** is a true and correct copy of the Decision & Order (William K. Taylor, J.) in *BRG Corporation v. Chevron U.S.A., Inc.*, Index #2014-8458, Supreme

Court of the State of New York, Monroe County, entered September 22, 2017, which was reversed on appeal, *see BRG Corporation v. Chevron U.S.A., Inc.*, 163 A.D.3d 1495, 82 N.Y.S.3d 798 (App. Div. 4th Dep’t 2018).

I declare pursuant to 28 U.S.C. §1746, under penalty of perjury, that the foregoing is true and correct.

Respectfully submitted,

**ASHCROFT LAW FIRM, LLC**

Dated: February 7, 2020

By: /s/ Michael J. Sullivan  
Michael J. Sullivan  
200 State Street, 7th Floor  
Boston, MA 02109  
T: 617-573-9400  
F: 617-933-7607  
[msullivan@ashcroftlawfirm.com](mailto:msullivan@ashcroftlawfirm.com)

*Counsel for Defendant Société  
Générale de Banque au Liban S.A.L.*